

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-against-

NOTICE OF MOTION
CR 11-1091 (S-1) (VM)
ECF Case

THOMAS DELALLA,

Defendant.

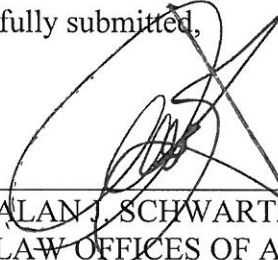
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PLEASE TAKE NOTICE, that upon the annexed declaration of the LAW OFFICES OF ALAN J. SCHWARTZ, P.C., dated the 14th day of September, 2012, and upon all proceedings had herein, the undersigned will move this Court at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, New York before the HONORABLE VICTOR MARRERO at a date convenient to the court, or as soon thereafter as counsel can be heard, for an Order granting the following relief:

1. Pursuant to Federal Rule of Criminal Procedure 7(f), the government should be directed to file a bill of particulars pertaining to the specific statements in Thomas DeLalla's disability application and the subsequent Disability Recertification form which are alleged to be false, as well as which of Mr. DeLalla's medical conditions were falsified or exaggerated.
2. To join in all applicable motions for legal relief sought by counsel for the co-defendants to date and for any and other relief the Court may deem just and proper.

DATED: September 14, 2012
Garden City, New York

Respectfully submitted,



By: ALAN J. SCHWARTZ
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To: Clerk of the Court (all via ECF)
AUSA Justin. S Weddle
AUSA E. Danya Perry
AUSA Daniel B. Tehrani
All defense counsel of record